

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

STACY ERNST, DAWN HOARD, IRENE  
RES-PULLANO, MICHELLE LAHALIH, and  
KATHERINE KEAN,

*Plaintiffs,*

v.

CITY OF CHICAGO,

*Defendant.*

Case No.: 08 C 4370

Judge Charles R. Norgle, Sr.

Magistrate Judge Jeffrey Cole

**DEFENDANT CITY OF CHICAGO'S UNOPPOSED MOTION  
TO TEMPORARILY SEAL AND WITHDRAW DKT. NOS. 505-3 & 577-2  
AND TO RE-FILE REDACTED MATERIALS**

Defendant, the City of Chicago (the "City"), by its undersigned attorneys, moves for leave to temporarily seal and withdraw Docket Nos. 505-3 and 577-2 and to re-file materials consistent with Local Rule 5.2 and the Protective Order.

1. On or about February 22, 2014, Plaintiffs produced to the City what they identified as Plaintiffs' earnings statements, under the Bates-range of PlaintiffS\_ID\_000118-Plaintiffs\_ID\_000183. Plaintiffs identified these materials as their "interim wage statements," Plaintiffs' Exhibits 33-37, at the Pretrial Conference. (See Feb. 25, 2014 P.M. Pretrial Conf. Tr. at 110, attached hereto as Exhibit A.)

2. The Protective Order provides that "[b]efore producing any Confidential Material, counsel for both parties shall redact the social security number, employee number, driver's license number, birth date, age, home address, and personal telephone numbers of any individual identified in the records." (Dkt. No. 31.)

3. The City believed that Plaintiffs had redacted personal information identified above in the documents labeled Bates-range Plaintiffs\_ID\_000118-Plaintiffs\_ID\_000183.

4. The City filed the materials as produced by Plaintiffs in Dkt. Nos. 505-3 and 577-2 in response to Plaintiffs' Proposed Findings of Fact and Conclusions of Law reading backpay.

5. However, upon review of the City's recent filings, the City determined that, in some cases, Plaintiffs' redaction of personal information was either ineffective or incomplete.

6. The City has contacted counsel for the Plaintiffs regarding this motion, and counsel for Plaintiffs do not object to this motion.

7. Accordingly, the City moves to temporarily seal Dkt. Nos. 505-3 and 577-2, and additionally moves for leave to withdraw the unredacted copies and re-file these materials consistent with the redaction requirements provided in Local Rule 5.2.

WHEREFORE, the City of Chicago asks that this Court grants its motion to temporarily seal Dkt. Nos. 505-3 and 577-2, to withdraw documents identified as Plaintiffs\_ID\_000118-Plaintiffs\_ID\_000183 as filed with the Court, to replace those documents with corresponding redacted documents, and grant such other and further relief as the Court deems just.

Dated: February 24, 2015

Respectfully submitted,

**THE CITY OF CHICAGO**

By: s/ John F. Kennedy

Respectfully submitted,

**STEPHEN R. PATTON,**  
Corporation Counsel of the City of  
Chicago

By: s/ Timothy Swabb

John F. Kennedy (ARDC No. 6196185)

[jkennedy@taftlaw.com](mailto:jkennedy@taftlaw.com)

Allan T. Slagel (ARDC No. 6198470)

[aslagel@taftlaw.com](mailto:aslagel@taftlaw.com)

Cary E. Donham (ARDC No. 6199385)

[cdonham@taftlaw.com](mailto:cdonham@taftlaw.com)

Elizabeth Babbitt (ARDC No.6296851)

[ebabbitt@taftlaw.com](mailto:ebabbitt@taftlaw.com)

TAFT STETTINIUS & HOLLISTER LLP

111 East Wacker Drive, Suite 2800

Chicago, Illinois 60601

Telephone: (312) 527-4000

Timothy Swabb

Assistant Corporation Counsel

30 N. LaSalle Street, Suite 1020

Chicago, IL 60602

312-744-8369/0898/9653

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